

<i>SERFF Tracking Number:</i>	<i>WKLY-125734472</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Shenandoah Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>39702</i>
<i>Company Tracking Number:</i>	<i>SH MS RI AR</i>		
<i>TOI:</i>	<i>MS06 Medicare Supplement - Other</i>	<i>Sub-TOI:</i>	<i>MS06.000 Medicare Supplement - Other</i>
<i>Product Name:</i>	<i>Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G</i>		
<i>Project Name/Number:</i>	<i>SH MS RI AR/</i>		

## Filing at a Glance

Company: Shenandoah Life Insurance Company

Product Name: Shenandoah Life Insurance      SERFF Tr Num: WKLY-125734472      State: ArkansasLH

Company Rate Filing for Medicare Supplement  
Standardized Plans A-G

TOI: MS06 Medicare Supplement - Other

SERFF Status: Closed

State Tr Num: 39702

Sub-TOI: MS06.000 Medicare Supplement -  
Other

Co Tr Num: SH MS RI AR

State Status: Approved-Closed

Filing Type: Rate

Co Status:

Reviewer(s): Stephanie Fowler

Author: Courtney Crocker

Disposition Date: 08/27/2008

Date Submitted: 07/22/2008

Disposition Status: Approved

Implementation Date Requested:

Implementation Date:

State Filing Description:

## General Information

Project Name: SH MS RI AR

Status of Filing in Domicile: Pending

Project Number:

Date Approved in Domicile:

Requested Filing Mode: Review & Approval

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Group Market Size:

Overall Rate Impact: 8%

Group Market Type:

Filing Status Changed: 08/27/2008

State Status Changed: 08/27/2008

Deemer Date:

Corresponding Filing Tracking Number:

Filing Description:

Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G

Form Numbers: MS-AA 5-06 AR – Plan A; MS-AB 5-06 AR – Plan B; MS-AC 5-06 AR – Plan C; MS-AD 5-06 AR – Plan D; MS-AE 5-06 AR – Plan E; MS-AF 5-06 AR – Plan F; MS-AG 5-06 AR – Plan G

SERFF Tracking Number: WKLY-125734472 State: Arkansas  
Filing Company: Shenandoah Life Insurance Company State Tracking Number: 39702  
Company Tracking Number: SH MS RI AR  
TOI: MS06 Medicare Supplement - Other Sub-TOI: MS06.000 Medicare Supplement - Other  
Product Name: Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G  
Project Name/Number: SH MS RI AR/

Rate Increase Requested: 8.0%

Filing pending in Domicile State of Virginia

## Company and Contact

### Filing Contact Information

(This filing was made by a third party - WAI01)

Courtney Crocker, Compliance Analyst courtney.crocker@wakelyinc.com  
Wakely and Associates, Inc. (727) 584-8128 [Phone]  
Largo, FL 33773-1502 (727) 584-5613[FAX]

### Filing Company Information

Shenandoah Life Insurance Company CoCode: 68845 State of Domicile: Virginia  
2301 Brambleton Ave SW Group Code: 891 Company Type: Life and Health  
Roanoke, VA 24025 Insurer  
(540) 985-4400 ext. [Phone] Group Name: State ID Number:  
FEIN Number: 54-0377280  
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## Filing Fees

Fee Required? Yes  
Fee Amount: \$350.00  
Retaliatory? No  
Fee Explanation: 7 forms @ \$50 per form = \$350  
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Shenandoah Life Insurance Company	\$350.00	07/22/2008	21533975

SERFF Tracking Number: WKLY-125734472 State: Arkansas  
Filing Company: Shenandoah Life Insurance Company State Tracking Number: 39702  
Company Tracking Number: SH MS RI AR  
TOI: MS06 Medicare Supplement - Other Sub-TOI: MS06.000 Medicare Supplement - Other  
Product Name: Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G  
Project Name/Number: SH MS RI AR/

## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved	Stephanie Fowler	08/27/2008	08/27/2008

<i>SERFF Tracking Number:</i>	<i>WKLY-125734472</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Shenandoah Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>39702</i>
<i>Company Tracking Number:</i>	<i>SH MS RI AR</i>		
<i>TOI:</i>	<i>MS06 Medicare Supplement - Other</i>	<i>Sub-TOI:</i>	<i>MS06.000 Medicare Supplement - Other</i>
<i>Product Name:</i>	<i>Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G</i>		
<i>Project Name/Number:</i>	<i>SH MS RI AR/</i>		

## Disposition

Disposition Date: 08/27/2008

Implementation Date:

Status: Approved

Comment:

<b>Company Name:</b>	<b>Overall % Rate Impact:</b>	<b>Written Premium Change for this Program:</b>	<b># of Policy Holders Affected for this Program:</b>	<b>Premium:</b>	<b>Maximum % Change (where required):</b>	<b>Minimum % Change (where required):</b>	<b>Overall % Indicated Change:</b>
Shenandoah Life Insurance Company	8.000%	\$794	6	\$9,930	8.000%	8.000%	8.000%

<i>SERFF Tracking Number:</i>	<i>WKLY-125734472</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Shenandoah Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>39702</i>
<i>Company Tracking Number:</i>	<i>SH MS RI AR</i>		
<i>TOI:</i>	<i>MS06 Medicare Supplement - Other</i>	<i>Sub-TOI:</i>	<i>MS06.000 Medicare Supplement - Other</i>
<i>Product Name:</i>	<i>Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G</i>		
<i>Project Name/Number:</i>	<i>SH MS RI AR/</i>		

<b>Item Type</b>	<b>Item Name</b>	<b>Item Status</b>	<b>Public Access</b>
<b>Supporting Document</b>	Health - Actuarial Justification	Approved	No
<b>Supporting Document</b>	Authorization Letter	Approved	Yes
<b>Rate</b>	Rate Pages	Approved	Yes

SERFF Tracking Number:	WKLY-125734472	State:	Arkansas
Filing Company:	Shenandoah Life Insurance Company	State Tracking Number:	39702
Company Tracking Number:	SH MS RI AR		
TOI:	MS06 Medicare Supplement - Other	Sub-TOI:	MS06.000 Medicare Supplement - Other
Product Name:	Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G		
Project Name/Number:	SH MS RI AR/		

## Rate Information

Rate data applies to filing.

<b>Filing Method:</b>	SERFF
<b>Rate Change Type:</b>	Increase
<b>Overall Percentage of Last Rate Revision:</b>	0.000%
<b>Effective Date of Last Rate Revision:</b>	
<b>Filing Method of Last Filing:</b>	SERFF

## Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):
Shenandoah Life Insurance Company	8.000%	8.000%	\$794	6	\$9,930	8.000%	8.000%

SERFF Tracking Number: WKLY-125734472 State: Arkansas

Filing Company: Shenandoah Life Insurance Company State Tracking Number: 39702

Company Tracking Number: SH MS RI AR

TOI: MS06 Medicare Supplement - Other Sub-TOI: MS06.000 Medicare Supplement - Other

Product Name: Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G

Project Name/Number: SH MS RI AR/

## Rate/Rule Schedule

Review Status:	Document Name:	Affected Form Numbers: (Separated with commas)	Rate Action:	Rate Action Information:	Attachments
Approved	Rate Pages	MS-AA 5-06 AR, Revised MS-AB 5-06 AR, MS-AC 5-06 AR, MS-AD 5-06 AR, MS-AE 5-06 AR, MS-AF 5-06 AR, MS-AG 5-06 AR		Previous State Filing Number: Percent Rate Change Request: 36325 8	AR rate pages.pdf

## CURRENT RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan A

#### Annual Base Rates

Ages	Preferred	Standard
All	1,258.00	1,398.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	1,510.00	1,678.00
Semi-Annual	755.00	839.00
Quarterly	377.50	419.50
Monthly	125.83	139.83

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,384.00	1,538.00
Semi-Annual	692.00	769.00
Quarterly	346.00	384.50
Monthly	115.33	128.17

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,132.00	1,258.00
Semi-Annual	566.00	629.00
Quarterly	283.00	314.50
Monthly	94.33	104.83

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9



## CURRENT RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan B

#### Annual Base Rates

Ages	Preferred	Standard
All	1,585.00	1,761.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	1,902.00	2,113.00
Semi-Annual	951.00	1,056.50
Quarterly	475.50	528.25
Monthly	158.50	176.08

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,744.00	1,937.00
Semi-Annual	872.00	968.50
Quarterly	436.00	484.25
Monthly	145.33	161.42

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,427.00	1,585.00
Semi-Annual	713.50	792.50
Quarterly	356.75	396.25
Monthly	118.92	132.08

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## CURRENT RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan C

#### Annual Base Rates

Ages	Preferred	Standard
All	1,760.00	1,956.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	2,112.00	2,347.00
Semi-Annual	1,056.00	1,173.50
Quarterly	528.00	586.75
Monthly	176.00	195.58

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,936.00	2,152.00
Semi-Annual	968.00	1,076.00
Quarterly	484.00	538.00
Monthly	161.33	179.33

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,584.00	1,760.00
Semi-Annual	792.00	880.00
Quarterly	396.00	440.00
Monthly	132.00	146.67

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## CURRENT RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan D

#### Annual Base Rates

Ages	Preferred	Standard
All	1,601.00	1,778.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	1,921.00	2,134.00
Semi-Annual	960.50	1,067.00
Quarterly	480.25	533.50
Monthly	160.08	177.83

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,761.00	1,956.00
Semi-Annual	880.50	978.00
Quarterly	440.25	489.00
Monthly	146.75	163.00

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,441.00	1,600.00
Semi-Annual	720.50	800.00
Quarterly	360.25	400.00
Monthly	120.08	133.33

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## CURRENT RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan E

#### Annual Base Rates

Ages	Preferred	Standard
All	1,615.00	1,794.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	1,938.00	2,153.00
Semi-Annual	969.00	1,076.50
Quarterly	484.50	538.25
Monthly	161.50	179.42

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,777.00	1,973.00
Semi-Annual	888.50	986.50
Quarterly	444.25	493.25
Monthly	148.08	164.42

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,454.00	1,615.00
Semi-Annual	727.00	807.50
Quarterly	363.50	403.75
Monthly	121.17	134.58

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## CURRENT RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan F

#### Annual Base Rates

Ages	Preferred	Standard
All	1,805.00	2,006.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	2,166.00	2,407.00
Semi-Annual	1,083.00	1,203.50
Quarterly	541.50	601.75
Monthly	180.50	200.58

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,986.00	2,207.00
Semi-Annual	993.00	1,103.50
Quarterly	496.50	551.75
Monthly	165.50	183.92

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,625.00	1,805.00
Semi-Annual	812.50	902.50
Quarterly	406.25	451.25
Monthly	135.42	150.42

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## CURRENT RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan G

#### Annual Base Rates

Ages	Preferred	Standard
All	1,637.00	1,819.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	1,964.00	2,183.00
Semi-Annual	982.00	1,091.50
Quarterly	491.00	545.75
Monthly	163.67	181.92

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,801.00	2,001.00
Semi-Annual	900.50	1,000.50
Quarterly	450.25	500.25
Monthly	150.08	166.75

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,473.00	1,637.00
Semi-Annual	736.50	818.50
Quarterly	368.25	409.25
Monthly	122.75	136.42

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## PROPOSED RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan A

#### Annual Base Rates

Ages	Preferred	Standard
All	1,359.00	1,510.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	1,631.00	1,812.00
Semi-Annual	815.50	906.00
Quarterly	407.75	453.00
Monthly	135.92	151.00

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,495.00	1,661.00
Semi-Annual	747.50	830.50
Quarterly	373.75	415.25
Monthly	124.58	138.42

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,223.00	1,359.00
Semi-Annual	611.50	679.50
Quarterly	305.75	339.75
Monthly	101.92	113.25

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## PROPOSED RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan B

#### Annual Base Rates

Ages	Preferred	Standard
All	1,712.00	1,902.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	2,054.00	2,282.00
Semi-Annual	1,027.00	1,141.00
Quarterly	513.50	570.50
Monthly	171.17	190.17

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,883.00	2,092.00
Semi-Annual	941.50	1,046.00
Quarterly	470.75	523.00
Monthly	156.92	174.33

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,541.00	1,712.00
Semi-Annual	770.50	856.00
Quarterly	385.25	428.00
Monthly	128.42	142.67

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9



## PROPOSED RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan C

#### Annual Base Rates

Ages	Preferred	Standard
All	1,901.00	2,112.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	2,281.00	2,534.00
Semi-Annual	1,140.50	1,267.00
Quarterly	570.25	633.50
Monthly	190.08	211.17

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	2,091.00	2,323.00
Semi-Annual	1,045.50	1,161.50
Quarterly	522.75	580.75
Monthly	174.25	193.58

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,711.00	1,901.00
Semi-Annual	855.50	950.50
Quarterly	427.75	475.25
Monthly	142.58	158.42

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## PROPOSED RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan D

#### Annual Base Rates

Ages	Preferred	Standard
All	1,729.00	1,920.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	2,075.00	2,304.00
Semi-Annual	1,037.50	1,152.00
Quarterly	518.75	576.00
Monthly	172.92	192.00

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,902.00	2,112.00
Semi-Annual	951.00	1,056.00
Quarterly	475.50	528.00
Monthly	158.50	176.00

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,556.00	1,728.00
Semi-Annual	778.00	864.00
Quarterly	389.00	432.00
Monthly	129.67	144.00

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## PROPOSED RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan E

#### Annual Base Rates

Ages	Preferred	Standard
All	1,744.00	1,938.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	2,093.00	2,326.00
Semi-Annual	1,046.50	1,163.00
Quarterly	523.25	581.50
Monthly	174.42	193.83

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,918.00	2,132.00
Semi-Annual	959.00	1,066.00
Quarterly	479.50	533.00
Monthly	159.83	177.67

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,570.00	1,744.00
Semi-Annual	785.00	872.00
Quarterly	392.50	436.00
Monthly	130.83	145.33

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## PROPOSED RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan F

#### Annual Base Rates

Ages	Preferred	Standard
All	1,949.00	2,166.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	2,339.00	2,599.00
Semi-Annual	1,169.50	1,299.50
Quarterly	584.75	649.75
Monthly	194.92	216.58

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	2,144.00	2,383.00
Semi-Annual	1,072.00	1,191.50
Quarterly	536.00	595.75
Monthly	178.67	198.58

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,754.00	1,949.00
Semi-Annual	877.00	974.50
Quarterly	438.50	487.25
Monthly	146.17	162.42

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

## PROPOSED RATES

### SHENANDOAH LIFE INSURANCE COMPANY

Medicare Supplement Policy  
Standardized Plan G

#### Annual Base Rates

Ages	Preferred	Standard
All	1,768.00	1,965.00

#### Zip Codes 720-722

Mode	Preferred	Standard
Annual	2,122.00	2,358.00
Semi-Annual	1,061.00	1,179.00
Quarterly	530.50	589.50
Monthly	176.83	196.50

#### Zip Codes 718, 719

Mode	Preferred	Standard
Annual	1,945.00	2,162.00
Semi-Annual	972.50	1,081.00
Quarterly	486.25	540.50
Monthly	162.08	180.17

#### Zip Codes: All Except 718-722

Mode	Preferred	Standard
Annual	1,591.00	1,769.00
Semi-Annual	795.50	884.50
Quarterly	397.75	442.25
Monthly	132.58	147.42

There is no modal loading.

Area Factors:

<u>Arkansas</u>	
720-722.....	1.20
718,719.....	1.10
Rest of State.....	0.9

SERFF Tracking Number: WKLY-125734472 State: Arkansas  
Filing Company: Shenandoah Life Insurance Company State Tracking Number: 39702  
Company Tracking Number: SH MS RI AR  
TOI: MS06 Medicare Supplement - Other Sub-TOI: MS06.000 Medicare Supplement - Other  
Product Name: Shenandoah Life Insurance Company Rate Filing for Medicare Supplement Standardized Plans A-G  
Project Name/Number: SH MS RI AR/

## Supporting Document Schedules

		Review Status:	
<b>Satisfied -Name:</b>	Authorization Letter	Approved	08/27/2008
<b>Comments:</b>			
Authorization Letter			
<b>Attachment:</b>			
2008 Shenandoah Life authorization letter.pdf			



# SHENANDOAH LIFE INSURANCE COMPANY

Kathleen M. Kronau  
Vice President, General Counsel & Secretary

Office: 800-848-5433, Ext. 4226  
Fax: 540-857-5916  
Email: [kathleen.kronau@shenlife.com](mailto:kathleen.kronau@shenlife.com)

July 22, 2008

Ms. Darcey Shaffer  
Compliance Manager  
Wakely & Associates, Inc.  
8545 126th Ave. North, Suite 200  
Largo, Florida 33773-1502

Re: Authorization Letter to File Medicare Supplement Forms and Rates

Dear Ms. Shaffer:

This letter authorizes Wakely and Associates, Inc. to file Shenandoah Life Insurance Company's Medicare Supplement forms and rates with State Insurance Departments. Also, Wakely and Associates, Inc. may correspond with the State Insurance Departments regarding any questions they may have concerning such filings.

A copy of this letter is as valid as the original. This authorization will be valid for twelve months from the date of this letter.

Sincerely yours,

Kathleen M. Kronau  
Vice President, General Counsel & Secretary